

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MARCUS MIAL,	:	
Plaintiff	:	
v.	:	Case No.: 1:11-cv-921
JENNIFER A. SHERIN, et al.,	:	
Defendants.	:	

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFF'S WITNESS LIST**

COME NOW the Defendants, Jennifer Sherin, Nathan Ferguson, Brian Sayre, and Nicholas Altom (hereinafter referred to collectively as "Defendants"), by and through their counsel, Alexander Francuzenko, Esq. and the law firm of Cook, Craig & Francuzenko, PLLC, and file this set of Objections to Plaintiff's proposed Witness List and, in support thereof, state the following:

1. Defendants object to the following witnesses: Golden Kirkland, Carolyn Ann Kirkland, Harry Neibich, Suzanne Prebish, Todd Saunders, Esq., Ann Slater, and Troy Atkinson based on their lack of personal knowledge, lack of foundation, relevance, hearsay, and any testimony they intend to offer is cumulative.

2. Defendants object to the following witnesses: Krishna Doddi, M.D., Elizabeth Richard, R.N., John Valenti, M.D., Mark Vives, M.D., and Todd Saunders, Esq. based on relevance, lack of foundation, and hearsay. Furthermore, Defendants would object to any expert opinion testimony from any of these witnesses, as they have not been identified as experts in this case, as required by the Federal Rules of Procedure, and the Orders of this Court.

3. Defendants reserve the right to object to any testimony at trial from the witnesses identified by the Plaintiff.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the foregoing Defendants' Objections to Plaintiff's Witness List via ECF Transmission and U. S. Mail, this the 25th day of September, 2014 to:

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\_\_\_\_\_/s/\_\_\_\_\_  
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